

**UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

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MARK MILLER, MICHELE GANGNES,  
SCOTT COPELAND, LAURA PALMER,  
TOM KLEVEN, ANDY PRIOR,  
AMERICA’S PARTY OF TEXAS,  
CONSTITUTION PARTY OF TEXAS,  
GREEN PARTY OF TEXAS and  
LIBERTARIAN PARTY OF TEXAS,

*Plaintiffs,*

v.

RUTH R. HUGHS, in her official capacity as the  
Secretary of State of the State of Texas, and  
JOSE A. “JOE” ESPARZA, in his official capacity as the  
Deputy Secretary of State of the State of Texas,

*Defendants.*

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Civil No. 1:19-cv-00700-RP

**PLAINTIFFS’ DESIGNATION OF EXPERTS**

Pursuant to the Court’s scheduling order (Dkt. 43) and Federal Rule of Civil Procedure 26(a)(2)(B), Plaintiffs Mark Miller, Michele Gangnes, Scott Copeland, Laura Palmer, Tom Kleven, Andy Prior, America’s Party of Texas, Constitution Party of Texas, Constitution Party of Texas, Green Party of Texas, and Libertarian Party of Texas (“Plaintiffs”) hereby designate the following testifying experts:

1. Lee Drutman  
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2. Richard Winger  
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Mr. Drutman and Mr. Winger will provide testimony regarding Plaintiffs' assertions that Texas's ballot access statutory scheme is far more restrictive than necessary to protect Texas's legitimate regulatory interests. Mr. Drutman's and Mr. Winger's opinions are set forth in reports that will be served upon all parties, but not filed, on January 26, 2021.

Dated: January 26, 2021

Respectfully submitted,

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*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on January 26, 2021, this document was filed electronically via the Court's CM/ECF system, causing electronic service upon all counsel of record.

/s/Oliver B. Hall  
Oliver B. Hall